III. REMARKS

Claims 1-20 were presented for prosecution. Claims 15-20 were rejected under 35 USC 101 as being directed to non-statutory subject matter. Claim 15 has been amended herein to address the rejection. Claims 1, 3-5, 7-11 and 13 are rejected under 35 USC 102(b) as allegedly being anticipated by Gonzales et al., US 4,725,885 ("Gonzales"). Claims 2, 6, 12 and 14 are rejected under 35 USC 103(a) as being allegedly unpatentable over Gonzales in view of Mukherjee (2005/0069217). Applicant respectfully traverses the 35 USC 102(b) and 35 USC 103(a) rejections for the reasons provided below.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

Applicant submits that Gonzales fails to teach each and every feature of claim 1 (and similarly independent claims 7 and 15). Claim 1 recites, *inter alia*, "a scaling system for geometrically scaling the bitonal image, wherein the scaling system reduces contiguous sets of original pixels down to a smaller set of scaled pixels." Gonzales does not teach these features. Gonzales provides a system in which grayscale pixels are coded for rapid transmission or improved storage based on neighboring pixels using DCPM coding. In such a system, a state value of each pixel required for encoding is based on quantization values of neighboring pixels. (See, e.g., Background of Gonzales.) Gonzales provides a system in which processing of the neighboring pixels is reduced. In particular, quantization levels of neighboring pixels are remapped to provide a reduction in the number of binary representations of the neighboring pixels. (See column 3, lines 46-50.) Nowhere does Gonzales teach (or remotely suggest)

reducing sets of original pixels down to a smaller set of scaled pixels. In other words, Applicant provides a system in which, e.g., two pixels are scaled down to a single pixel in order to scale, i.e., reduce the pixel size of the image. In Gonzales, the same number of pixels that are inputted are also outputted – there is no reduction in the number of pixels in the image. Instead, Gonzales teaches reducing possible quantization values of neighboring pixels in order to reduce processing required during entropy encoding. This is completely unrelated to the presently claimed application in which pixels are actually eliminated altogether.

Moreover, Applicant claims a process for scaling a *bitonal* image. As is readily understood in the art, a bitonal image is an image that has only two tones or colors (e.g., black white, blue white, etc.). Conversely, Gonzales provides a system that operates on a grayscale image, which has for example 256 different shades of gray. The encoding process of Gonzales has no application to a bitonal image, since entropy encoding would never be applied to an image in which pixels are already represented as 1 or 0. For these reasons, Applicant submits that claim 1 (and similarly claims 7 and 15) is not anticipated by Gonzales.

Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features. For instance, claim 3 recites reducing a pair of pixels down to a single pixel based on four pixel values, wherein the four pixel values include the two values of the pair of pixels and two values of two pixels that flank the pair of pixels. Clearly, Gonzales provides no such teaching.

Applicant respectfully submits that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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